

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF PENNSYLVANIA**

---

IN RE: : No. 18-11587-amc  
THE ESTATE OF SHANE KELLY : Chapter 13  
ABBOTT, SR. :  
Debtor

---

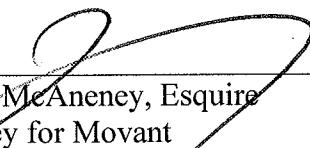
**HATBORO FEDERAL SAVINGS BANK'S MOTION FOR RELIEF FROM THE  
AUTOMATIC STAY**

1. Shane Kelly Abbott, Jr., Administrator of the Estate of Shane Kelly Abbott, Sr., filed a Petition through counsel under Chapter 13 of the United States Bankruptcy Code on or about March 8, 2018.
2. Movant is the Mortgagor of the subject of the proposed foreclosure action: 319 Maple Street, Warminster, Pennsylvania, 18974 (hereinafter referred to as the "Property").
3. Debtor has not remained current on payments to Movant while in bankruptcy.
4. Significantly, Debtor never received Notice of Debtor's bankruptcy filing on Movant, and Movant only found out about the bankruptcy when doing a standard bankruptcy search prior to filing a foreclosure action against Debtor.
5. Movant hereby moves this Honorable Court for relief from the Automatic Stay by Agreement pursuant to USCS Bankruptcy R 4001(d).
6. The original Mortgagor died and nothing has been done with the Estate of Shane Kelly Abbott, Sr.

**WHEREFORE**, Movant prays that this Court issue an Order granting the following:

1. Immediate relief from the Stay as to Movant;
2. Allowing Movant to proceed under applicable non-bankruptcy law to enforce its remedies to proceed with filing a Complaint in Foreclosure against the Property.

**TIMONEY KNOX, LLP**

By: 

John J. McAneney, Esquire  
Attorney for Movant  
Hatboro Federal Savings Bank

Dated: 8/9/18